

**TOF Public Consultation Comments**

S. No	Reviewer (Eg. Name and/or Organisation)	Criteria/ Indicator (Eg. 1.1)	Paragraph (Eg. Para 1)	Type of Comment G= General T = Technical E = Editorial	Comment	Proposed Change	Observations (NCCF)	Action Taken (NCCF)	Status (NCCF)
1	RS			G	Agroforestry standards should be simple and easily do-able. Record keeping should be easy and user-friendly if millions of farmers are to benefit from it.		No changes ; highlight 2.7 & 2.6	No Changes proposed by TWG	done
2	RS			G	Quantification of eco-services provided by trees on farms / trees in agricultural landscapes is another aspect which will need to get factored in. How will this be done? Where is the research, cutting edge thinking and pilots on this, needs to be explored and worked on further.		Theme D; goods and services , change I 4.1.3 ;	No Changes proposed by TWG; to check doc for LMU & TOF Management	done
3	Star Paper Mills Ltd.			T	Incorporation of wood waste of plywood industries as input category of raw material to paper industries. The output paper products should be Certified Product.		out of the perview of Group ;	provide description reference to CoC categories - PEFC for the ease of the reviewer	done
4	AKV			T	list of laws applicable must be provided in the annexure for the benefit and clarity of the LMUs and the auditors		accepted;	will make the generic list	ongoing
5	AKV			T	Exempt the linear trees planted on farmers' bunds also from some of the themes as done for standalone/scattered trees.		include in foreword and also include in the glossary- linear strips and plantations can put a threshold on the bund plantation eg- area wise etc and exempt that . Needs consideration post pilot testing	modified accordngly	ongoing
6	AKV			T	Exempt the rigour of full standards for the block plantations raised on privately held smaller chunks/parcels	suitably modify them as in the concept of SLIMF (for which 2 Ha could be upper limit for each owner/land holder in Indian context ) and /Group Certification	conclusive action post pilot test ; research ongoing on the average size holding for fixing the thershold size	needs consideration	ongoing
7	AKV	Glossary	Glossary	T	Definition of ToF particularly for social forestry in non –recorded forest areas needs careful thinking		Needs to be considered	Glossary being revised	ongoing
8	AKV			T	North East states' peculiar community right on land and agriculture cum forestry activities/practices thereon does not seem to have been addressed.		the scope the addresses the concerns	explicit mention not required	done

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9	AKV			E	Use of 'should' throughout the document	To be replaced by 'endeavour to' as far as possible throughout the document	It has already been taken care of ; in case of any further changes it will be done . Review the document and make suggested changes wherever possible	review the doc for this and make appropriate changes	done
10	VPS/ICRAF			G	There are so many certification criteria that need be complied with, but the document does not spell anywhere how this could be done, and whether doing so will add any value to the producer.				done
11	VPS/ICRAF			G	There are other agencies, such as the MNREGA, watershed programs, who are promoting tree planting on the farms in a big way. Their efforts also need to be sufficiently taken account and acknowledged in the draft.		Can be talked about in Introduction part of the TOF standard	introduction - add and acknowledge the scheme part	done
12	VPS/ICRAF			G	It will be better if the 'certification' in its present form is made limited only to the forest produce, as was the original goal of the NCCF, and the TOF by type get a separate sections for them.	However, if at all agroforestry will be included in a single draft, the following three criteria should suffice the purpose.  a. The planting material is sourced from a certified agency, b. The trees are grown by following the recommended practices, and c. The trees requiring certification have been grown on the farm	Standard already has standalone as separate	no change required	done
13	VPS/ICRAF			G	It would be better to treat different types of TOF discretely and mutually exclusive from each other; at least agroforestry should get a separate and exclusive space in the draft. If these are not addressed properly, the NCCF efforts in the long run may become counterproductive to agroforestry spread.		It is mentioned in the scope . Will be reviewed after pilot testing	to be reviewed after Piloting	ongoing
14	AFRI Workshop			G	Provisions have to be there to ensure the TOF certification system runs corruption free		NCCF will ensure the quality check is there for CBs	no action required	done
15	AFRI Workshop			G	How will cases be dealt, where farmers may plant trees only for one cycle and shift to agriculture in the next		No restriction from NCCF side. the farmer will not be eligible for next evaluation and can move on to agriculture as and when they want	no action required	done

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16	AFRI Workshop			G	For TOF what are the linkages with the current policy regimes		Linkages are implicit in the existing and evolving policy regimes	no action required	done
17	AFRI Workshop			G	Step by step implementation of the standard		can be decide after piloting	no action required	done
18	AFRI Workshop			G	Cost involved in certification should be moderate else there should be ways identified to reduce this cost		will be kept in view	to be reviewed after Piloting	done
19	AFRI Workshop			G	Land quality aspect should be taken into consideration		can be decide after piloting	to be reviewed after Piloting	ongoing
20	CAFRI Workshop			G	Hindi Translation of Standard		accepted	to be done at the final stage	to be done after final standard is ready
21	CAFRI Workshop			T	Land consolidation and family farming issues should be addressed		social forestry and highway plantation will be included	accepted	done
22	CAFRI Workshop			G	Preparation of operational guidelines. Quantification of operational guidelines		to be considered after Piloting	no action required currently	done
23	CAFRI Workshop			G	Evolving linkage with producer group model		accepted	will be considered in Piloting and actual implementation	done
24	RP/ICRAF	Introduction (Page 5)	Para 1 'introduction'	G	Not just planted, they have regenerated naturally or are a result of FMNR		This is taken from Indian history. Avenue trees were planted along the roads during Ashoka period.	Agreed. Suggestion added	done
25	RP/ICRAF	Introduction (Page 6)	Para 5 'standalone'	G	This is a problematic concept in many cases because trees are often part of an agricultural system - supporting crops, livestock or household needs. They are there fore not standalone.		The concept refers to trees which are scattered in the farm lands and else where as isolated tree or in single row whose area generally cannot be determined. The concept does not involve other agricultural components. The focus is economic return from such trees.	no change required	done
26	RP/ICRAF	Scope	Para 1 'certifying'	G	what? Management? Sustainability? What exactly is being certified and what do these terms mean in this context?		The certification process refers to only to trees. If such trees are managed well after preparing a management plan (except standalone), it takes care of sustainability. Good management for such trees has already been narrated /covered under different criteria.	no change required	done

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27	RP/ICRAF	Scope		G	Agroforests: what is the purpose? What does sustainability mean in this context? Therefore what is the meaning of good management in this context? There is a danger that trees are being seen as divorced from the system and context within which they are managed/exist.  Similarly for Urban forests.  In dealing with this there is the need also to deal with issues of temporal and spatial scales.				
28	RP/ICRAF	Standalone Tree Model		G	it would be important to have a section where all of these are clearly defined.		term to be added	Glossary being revised	done
29	O P Shukla, JK Paper Ltd	Scope		G	Tree inside state forest corporation plantations to be included in certification systems.	Tree inside state forest corporation plantations to be included in certification systems.	Social forestry & highway plantation will be included	document contains this information	done
30	WWF India	Theme A		G	ILO conventions shall be complied by the producers	Include ILO conventions in some indicators	accepted	Document to be reviewed and modified; changes to be made after Pilot Testing accordingly (C 5.2)	ongoing
31	VPS/ICRAF	Criterion 1.1	Theme A, Criterion 1.1	T	On farm grown trees should and in some states are being treated as agriculture produce, therefore, exempted from taxation. This aspect is overlooked				
32	RP/ICRAF	Criterion 1.1	Theme A, Criterion 1.1	E		TOF management complies..... <i>in the jurisdiction.....</i> applicable royalties and taxes.			
33	RP/ICRAF	Criterion 1.2	TOF management	G	This is not going to be possible as there is no single entity managing TOF (unlike in the case of forests) - for any given landscape there may be a large number of entities that are producing timber - not to mention other products - from TOF		Its true that there are several entities involved in the TOF management. To overcome this two management approaches have been proposed, i. buyer led ii. Group management certification.	no change required	done
34	RP/ICRAF	Criterion 1.2	illegal logging	T	see provisions of agroforestry policy				ongoing

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35	RP/ICRAF	Criterion 1.2	illegal land use.....	G	This will have to come from some aggregating entity, such as govt. or if private sector then buyers...			no change required	done
36	Development Alternatives	Criterion 1.2	Theme A, Criterion 1.2	G	Can we also include illegal agricultural practices (cattle ranching, slash and burn practice)		Indicator 1.2.1 already addresses this, the list of practices can be unending	no change required	done
37	Development Alternatives		Theme A	G	Till what extent is the illegal activity restricted in the value chain? Is it only production or includes transportation, processing and trading?		Illegal activity prohibited within the certified boundary of the TOF Management . Further Value chain will come under the pervuew of the CoC	no change required	done
38	WWF India	Indicator 1.2.1	Theme A, Criterion 1.2	T		Add 'including demonstrable process to report any illegal activity if it takes place.'	Accepted	will be added in the I 1.2.2 (add Illigecal activity, if any , are recorded)	done
39	IPAPPM	Criterion 1.2 Indicator 1.2.1	Para 1 & 2	T	Clarity is needed on "TOF Management". If that means the Organization like IPAPPM, then it is to be noted that IPAPPM does not have resource to stop any illegal activity on LMU land as that is privately owned and many in number.	If TOF Management means the Organization who is the NCCF certificate owner, then, it must not hold the Organization responsible for illegal activity on the farmer owned land. The responsibilities of the LMU and the Organization may be clarified further in detail.	Group certification standard will ensure that	Note added	done
40	IPAPPM	Criterion 1.3 Indicator 1.3.1	Para 2	T	In India, ownership of land and use rights are not clear in many cases as properties are inherited for generations. Therefore, this is always a matter of debate to ensure such condition.	This indicator has to be made simpler keeping Indian landholding context clearly in mind.	it is already addressed in the Indicators of C 1.3	Language of indicators reviewed for simplication	done
41	WWF India	Indicator 1.3.3	Theme A, Criterion 1.3	E	Records of disputes and their mode of resolution have no correlation with avoidance of litigation. Please clarify this indicator.		accepted	1.3.3 - removed the term litigation	done
42	WWF India	Indicator 1.3.4	Theme A, Criterion 1.3	T	Define 'Legal boundaries'		accepted	to be defined in glossary	done
43	AKV	Indicator 1.3.5	Theme A, Criterion 1.3	T	Kept open ended; a cut off date?		Not required	no change required	done

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44	Aditya Petwal / IUCN	Theme A Criteria 1.4 (new addition)	Theme A	T	New Addition to bring clarity at source, about the CITIES species grown by growers with aspiration of selling in international market.	In ToFs Species given in CITES list with a motive to use in international trade should specially have the records of responsibly sourced, sustainably produced as well as sustainably harvested.	to be under CoC section of the standard	a. add Indicator for CITES under Theme A b. Add the proposed change in Theme B (2.6)	done
45	Development Alternatives	Indicator 2.1.3	Theme B	E	Adequate resources for the implementation of management plan with well defined work plan		Not required in TOF	no change required	done
46	RP/ICRAF	Theme B	Management Plan	G	This is a problematic premise, it can exist, but most-ften it will not		Management plan is essential for certification as well as for sustainability of TOF resource. The two approaches proposed above takes care of this issue.	further modifications will be taken-up after Piloting	done
47	IPAPPM	Criterion 2.2 Indicator 2.2.1	Para 1	T	Clarity needed for the phrase "if notified by local/state governments"		Food security assessment was never a requirement; Food security or agricultural activities are not negatively affected by TOF management activities, as evident from any state/local government authorities.	modified accordngly	done
48	IFGTB	Indicator 2.2.2	Theme B Criterion 2.2	G	Food security assessment may not be possible by Land Management Unit (LMU) or may be misleading		Food security assessment was never a requirement; Food security or agricultural activities are not negatively affected by TOF management activities, as evident from any state/local government authorities.	modified accordngly	done
49	IPAPPM	Criterion 2.3 Indicator 2.3.1	Para 1 & 2	T	Clarity required on how to maintain the details of each LMU boundary in management plan when the number of LMU goes in to thousands. Moreover, geo-coordinates of such a large number of LMU is not feasible.		accepted; to include details of operational area including type of land, ownership, use rights, etc.	modified accordngly	done
50	Development Alternatives	Indicator 2.7.1	Theme B Criterion 2.7	T	Can we include one more parameter on monitoring of the harvest? Or defining a schedule for harvest		will be part of Management Plan; TOF management is free to add extra indicators in MP	no change required	done
51	Development Alternatives	Indicator 2.7.2	Theme B Criterion 2.7	T	Management plan to include the procedures of grading and packaging of certified wood		is part of CoC	no change required	done
52	WWF India	Indicator 2.7.3	Theme B Criterion 2.7	G	Monitoring shall be done annually.	Add 'atleast annually'	vary depending on the TOF management/ resource	no change required	done
53	WWF India	Indicator 2.8.1	Theme B Criterion 2.7	G	Management plan revision shall be done annually	Add 'atleast annually'	vary depending on the TOF management/ resource	no change required	done

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54	IFGTB		Theme C	G	Criteria for Urban forestry are insufficient.		considered	more indicators will be added	ongoing
55	IFGTB		Theme C	T	Does not address damages to tree in an urban landscape i.e. overhead electric line, telephone line, subterranean sewage, drainage, flood cause ways, buildings, gas lines etc.		does not fall under our scope	no change required	done
56	IFGTB		Theme C	T	Criteria does not address volatile compounds exuded by trees in Urban environment, fibre, flosses , allergens etc.		relook the standard for the inclusion/modification	2.1.2 b) added (site and species, selection and suitability)	done
57	RP/ICRAF	Criterion 3.1	TOF resource		what is this? The trees? The soils? Water? All of the above?		Only trees. Will define appropriately in glossary.	Glossary being revised	done
58	O P Shukla, JK Paper Ltd	Criterion 3.1	Theme C	G	As most of the pulpwood species are coppicable hence regeneration is happens via coppice crops. TOF- Biodiversity will be relooked to be included in the criteria as it is farmers choice that which tree species to be planted in his farm lands.	Biodiversity will be relooked to be included in the criteria as it is farmers choice that which tree species to be planted in his farm lands.	3.1.4 modified, added to the extent possible	redrafting done as required	done
59	IPAPPM	Indicator 3.1.4	Indicators as mentioned	T	Pulpwood are mainly grown as block plantations which is the 2nd category as per NCCF. Biodiversity spot development and maintenance requires additional land and human resource that is not available either with the Organization or with the farmers.		i.e. mentions to the extent possible	redrafting done as required	done
60	Development Alternatives	Indicator 3.2.1	Theme C, Criterion 3.2	T	methods of measuring vitality should be laid down focussing on biomass increment, incidence of disease and pest, growth efficiency, periodic monitoring of tree height and diameter		biomass - that will be limiting factor as then people wont grow slow growing species	no change required	done
61	IFGTB	Indicator 3.3.1	Theme C, Criterion 3.3	G	Newer technologies can take care of edaphic condition		explicit mention not required; such things are dependent on the owner/manager	no change required	done
62	IFGTB	Indicator 3.3.1	Theme C, Criterion 3.3	G	Newer technologies can take care of invasiveness, pest, disease and other damages		explicit mention not required; such things are dependent on the owner/manager	no change required	done
63	IFGTB	Criterion 3.3	Theme C	T	Criteria for incorporating such agroforestry plantation following safe practices should be included like 3.5.		covered under 2.1.1	no change required	done
64	AKV	Criterion 3.3	Theme C		what about spp that are banned by specific govt orders as Eucalyptus in Karnataka?		Covered under legality theme	no change required	done

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65	RP/ICRAF	Criterion 3.4	use of pesticides and herbicide	G	Where? On TOF? Or in the landscape? Or both?		Specifically for TOF taking into consideration its impact on the landscape components as well.	no change required	done
66	IPAPPM	Criteria 3.4 & 3.5 Indicators 3.4.2 & 3.5.2	Indicators as mentioned	T	Banned or allowed pesticide/ fertilizer/ chemical list is expected from the Certification Body. List of banned chemical, and National or State SOPs to use them are new things and need further clarity.		accepted	missing information required will be added	ongoing
67	RP/ICRAF	Indicators 4.1.1-4.1.3	Theme D, Criterion 4.1	G	These are all problematic and need a rethink		Piloting will provide a better picture	no change required	done
68	AKV	Indicator 4.1.1	Theme D, Criterion 4.1	G	needs a relook on agriculture / many marginal and fallow lands not fit for productive agriculture?		agriculture is optional activity and is choice of owner	no change required	done
69	WWF India	Indicators 4.3.1, 4.3.2	Theme D, Criterion 4.3	T		Remove 'wherever possible'.	accepted	modified accordingly	done
70	IFGTB		Theme D	T	Criteria for cutting of branches, felling a dangerous tree, replacement of tress with suitable alternatives, pest and disease management in urban environment etc need to be incorporated.		Mentioned in Criterion 2.1	no change required	done
71	WWF India	5	Theme E	T	There should be proper records of accident and counter measure taken after the accident.		accepted	modified accordingly	done
72	Development Alternatives	Criterion 5.2	Theme E	G	Any other- ILO code of practice for safety and health in forestry work		Health and safety mentioned in Criterion 5.3; relevant ILO codes to be added in the standard	Document to be reviewed and modified; changes to be made after Pilot Testing accordingly	ongoing
73	WWF India	Criterion 5.2 & Indicator 5.2.2	Theme E, Criterion 5.2	T		Include 'Race'	accepted	modified accordingly	done
74	WWF India	Indicator 5.2.1 (d)	Theme E, Criterion 5.2	T		Add 'legal' wage agreements with workers.	accepted	modified accordingly	done
75	Development Alternatives	Theme E		G	criteria for family farm labor		explicit mention of family farm labour not required	no change required	done
76	Development Alternatives	Theme E		G	Might be good to add a indicator on the workforce's skill and qualifications especially at Managerial/supervisor level and provision of appropriate training at worker level		Training already mentioned in Indicator 2.5.3; workforce skill and qualifications a matter of organisation	no change required	done
77	Development Alternatives	Indicator 5.2.4	Theme E, Criterion 5.2	T	One more indicator can be added on forced labor		add new indicator for this	modified	done
78	WWF India	Indicator 6.1.1	Theme F, Criterion 6.1	E	Impossible for one can be possible for others. Areas or sites with significant importance shall be identified with stakeholders discussion.	Remove 'wherever possible'.	accepted	modified accordingly	done



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79	WWF India	Indicator 6.1.2	Theme F, Criterion 6.1	T	Protected, rare, threatened endangered plant species shall not be harvested for any purpose.	Replace 'for commercial purposes' with 'for any purpose'	not accepted; even for some ecosystem and other requirements some threatened and rare species needs to be removed/harvested; we intend to avoid the requirement for commercial purposes ; we intend to protect the speicies also within the site	a.removed proctected from 6.1.2 ; added existing on sites identified in 6.1.1. should be conserved	done
80	WWF India	Indicator 6.1.4	Theme F, Criterion 6.1	E	Should not be limited to 'Traditional Management Systems' only.	Remove 'Traditional'	modified	management system including tradional systems	done
81	WWF India	Indicator 6.2.2	Theme F, Criterion 6.2	T	Define 'Inappropriate use' and provide the details of chemicals and other harmful substances which shall not be used		modified, word inappropriate removed	cross reference 3.4.4	done
82	IFGTB	Criterion 6.3	Theme F	T	Okay with the criterion.	But may be allowed under certain intense cultivation techniques. Criteria should include them	fulfills the requirement and explanation is as mentioned T		done
83	WWF India	Indicator 6.4.2	Theme F, Criterion 6.4	T	Ensure that any use of biological control agents complies with recognized standards and protocols.	Add 'any use of biological control agents complies with recognized standards and protocols'	accepted	New indicator added in 6.4.2	done
84	Aditya Petwal / IUCN	Theme F Criteria 6.5 (new addition)	Theme F	T	New Addition in spirit of biodiversity conservation. ToFs complying in many other aspects but planned at the cost of another important ecosystem, it should still be discouraged or scored low.	The arrangement and development of the TOFs should also be such, that it complements and not competes with the surrounding or existing ecosystems. For example: Many plantations are seen and heard to be coming up over encroached wetlands (CPR). Historical record (atleast from a refence year say- development of this standard) should be maintained.	a. 6.1.3 modify b. add a new indicator 6.1.5 - as suggested "development and management operation of ToF be such that it complements....."	a. Indicator 6.1.3 modified b. Indicator 6.1.5 added	done